

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Trisha D. McCormick, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am an “investigative or law enforcement officer” of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and empowered by law to conduct investigations and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.

2. I am a Special Agent with the FBI and have been so employed since September 12, 2010. I was previously employed as a Police Officer for the Ankeny, Iowa Police Department from January 2007 to September 2010. In connection with my official duties as a Special Agent of the FBI, I investigate criminal violations of the Controlled Substances Act, among other crimes. I have received specialized training in the enforcement of federal narcotics laws and other laws. I am specifically assigned to the Criminal Enterprise Squad targeting Mexican Criminal Enterprises. As an FBI Special Agent assigned to the Criminal Enterprise Squad my official duties include but are not limited to investigation into criminal violations of the Controlled Substances Act and ongoing criminal enterprises. My training and experience have involved, among other things, (a) the debriefing of defendants, witnesses, and informants who have knowledge of the distribution and transportation of controlled substances, and of the laundering and concealment of proceeds of drug trafficking; (b) surveillance; (c) analysis of documentary and physical evidence; and (d) participation in previous wire intercept investigations. Based on my training and experience as a FBI agent, I have become familiar with the manner in which narcotics traffickers conduct their drug-related businesses, including the methods employed by narcotics distributors to import and distribute narcotics, and their use of

coded language to refer to narcotics, drug proceeds, and other aspects of narcotics trafficking. I received law enforcement training for the investigation of money laundering offenses and participated in investigations of the possession, manufacture, and distribution of controlled substances, including cocaine, methamphetamine, crack cocaine, and marijuana. I have also acquired knowledge and information about investigations from on-the-job training, from other law enforcement officers, and from other investigations that I have conducted or have been so involved.

3. The information contained in this affidavit is based upon my investigation and information provided to me and others by persons and agencies that I believe to be reliable. Except where otherwise noted, Special Agents of the FBI, other law enforcement officers, or other third parties have provided the information set forth in this affidavit to me either directly or indirectly. As such, information this affidavit may not reflect my personal observations or investigations, but it is information I am aware of and adopt herein for the purposes of this affidavit. Because this affidavit is being submitted for the limited purpose of securing authority to search the identified vehicle and telephone, I have not included every fact known about the investigation, even though I am familiar with the facts and circumstances surrounding this investigation.

4. Based on the facts set forth in this Affidavit, there is probable cause to believe that violations of 18 U.S.C. 751 and 18 U.S.C. 752 have been committed, are being committed, and will continue to be committed by **Sergio Perez-Martinez, Trevor Sparks, and Steven Lydell Williams Sr.**, 6138 Citadel Drive, Apartment 205, Kansas City, Missouri 64110.

5. This Affidavit is submitted in support of an application for a Search Warrant for a 2001 ~~22001~~ white Mercedes SUV bearing California license 5FRE875, Vehicle Identification Number (VIN) 4JGAB54E91A260440, registered to Eugene Michael Williams from Wilmington, California hereinafter referred to as the **Target Vehicle** and a black TLC smartphone, International Mobile Equipment Identity (IMEI) 016062002421602, phone number 816-786-9700, hereinafter referred to as the **Target Telephone**.

PROBABLE CAUSE

6. The FBI, USMS, and Kansas City, Missouri, Police Department (KCMOPD) are conducting a criminal investigation of the escape of **PEREZ-MARTINEZ** and **SPARKS** from Cass County Jail. On December 6, 2022, the United States Marshals Service for the Kansas City office was notified by Cass County, Missouri that **SPARKS** escaped from confinement and was seen leaving the facility at 10:22 p.m. on December 5, 2022. Upon further review it was identified that **SPARKS** and **PEREZ-MARTINEZ**, another inmate in the Cass County facility, forcibly escaped from the Cass County Jail and fled east.

7. In reviewing phone calls made from both **SPARKS'** and **PEREZ-MARTINEZ's** accounts, it was determined that on December 5, 2022, at 9:45 PM, a telephone call was made from the jail to an individual using the **Target Telephone**. From listening to the phone call, **SPARKS** was the individual who made the phone call and **WILLIAMS** (Steven Lydell Williams, Sr.) was the recipient of the telephone call. This identification was made by investigators with years of experience investigating and being familiar with both **SPARKS** and **WILLIAMS**. During the recorded call, it was discussed where **WILLIAMS** should be around 10 p.m., presumably the night of December 5th. Apparently, **SPARKS** was planning to escape from confinement and **WILLIAMS** was going to assist him in the escape.

8. In reviewing phone calls made from both **SPARKS** and **PEREZ-MARTINEZ'S** accounts, the following jail calls between **SPARKS**, in custody, and from a recorded telephone line, and **WILLIAMS**, using the **Target Telephone**, were identified:

- a. December 4, 2022, between 3:46 pm and 9:46 pm, during four separate phone calls **SPARKS** asked **WILLIAMS** repeatedly to get in touch with his mother. **SPARKS** said his mother was not answering the phone.
- b. December 5, 2022, at approximately 10:19 am, **SPARKS** asked **WILLIAMS** if “everything was legal” on his car. **WILLIAMS** said yes that he knows of then changes his answer to say the vehicle tags are expired and the call ended.
- c. December 5, 2022, at approximately 8:00 pm, **SPARKS** told **WILLIAMS** to come to Casey’s General Store on West Mechanic Street in Harrisonville, Missouri. This is across Interstate 49 (Highway 71) from the Cass County facility. **WILLIAMS** appears to look up the address to Casey’s on his phone to calculate the drive time from **WILLIAMS’** residence. At the end of the call **SPARKS** asked **WILLIAMS** how long it will take for **WILLIAMS’** cousin to call back. **WILLIAMS** said he will “get it for him.”
- d. December 5, 2022, at approximately 8:10 pm, **WILLIAMS** told **SPARKS** he was getting ready to go pick up the money and **WILLIAMS** said something was 31 minutes. **Sparks** said he would call **WILLIAMS** back in 20 to 30 minutes to let **WILLIAMS** know when to start traveling to a location and he would give **WILLIAMS** directions from there. **SPARKS** told **WILLIAMS** not to leave until **Sparks** calls back.

- e. December 5, 2022, at approximately 9:09 pm, **SPARKS** asked **WILLIAMS** what he was doing, and **WILLIAMS** replied he was getting gas. **SPARKS** instructs **WILLIAMS** to leave at 9:30. **SPARKS** told **WILLIAMS** to listen very carefully and asked what kind of car **WILLIAMS** was driving. **WILLIAMS** said his “white 30.” Sparks instructs **WILLIAMS** to park near the diesel pumps at Casey’s and confirms that would put **WILLIAMS** there at 10:00 pm and **WILLIAMS** confirms. Sparks said: “they would show up sometime between 10:15 and 10:30 don’t leave until they get there and it’s going to be black truck and they are going to call you as soon as they hit the parking lot.” **WILLIAMS** replied “ok.” **SPARKS** said he would call **WILLIAMS** at 9:45 to see where he is and to confirm **WILLIAMS** was on the road. **SPARKS** again instructs **WILLIAMS** to not leave until “they” get there even if it’s 10:45. **WILLIAMS** again confirms he needs to be at Casey’s on West Mechanic Street in Harrisonville. **SPARKS** told **WILLIAMS** for a third time to be there and not to leave. **WILLIAMS** said, “alright Nephew” and **SPARKS** said, “alright Pops.” Investigators are familiar with **SPARKS** being referred to as “Nephew” and **WILLIAMS** being referred to as “Pops.”
- f. December 5, 2022, at approximately 9:45 pm, **SPARKS** called **WILLIAMS** and **WILLIAMS** said he was there, and **SPARKS** responds he thought “they” would be there by now. **SPARKS** said “they” said about 10:00 or 10:15 and “they” were on the way. **SPARKS** said he would call back before lockdown. **SPARKS** said even if he does not get to call back for **WILLIAMS** to not leave. **WILLIAMS** asked if “they” were “white folk” in a black truck and **SPARKS**

confirms. Sparks and Perez-Martinez are White. Williams is Black. **SPARKS** described the black truck as a bigger, newer truck. **SPARKS** said, “they are just going to give it to you.”

- g. On December 6, 2022, **WILLIAMS**’ wife and son were interviewed and confirmed the **Target Telephone** was used by **WILLIAMS**.
- h. On December 6, 2022, at approximately 11:50 am, **WILLIAMS** was arrested driving the **Target Vehicle**. **WILLIAMS** was driving **Target Vehicle** during a September 1, 2021, property damage accident reported to the Kansas City, Missouri, Police Department.
- i. A vehicle like the **Target Vehicle** described herein was observed from video obtained from Casey’s in the Casey’s parking lot at 1901 W. Mechanic Street, Harrisonville, Missouri, at the times discussed in the calls. It parked at the diesel pumps, as directed on one of the jail calls by **SPARKS**. However, the video view did not show anyone exit or enter the SUV. At approximately 10:31 pm what appears to be the same white SUV like the **Target Vehicle** was observed exiting the Casey’s parking lot.

9. On December 6, 2022, a tip was received regarding **PEREZ-MARTINEZ** and **SPARKS** being located at **WILLIAMS'** residence at 6138 Citadel Drive, Apartment 205, Kansas City, Missouri. According to **WILLIAMS** State of Missouri Probation Officer, **WILLIAMS'** last known address was 6138 Citadel Drive, Apartment 205, Kansas City, Missouri. On December 6, 2022, at approximately 2:15 p.m., Investigators contacted management at 6138 Citadel Drive and reviewed video surveillance cameras. Management at the 6138 Citadel Drive confirmed that **WILLIAMS** resided there.

10. From that video, it was observed that on December 6, 2022, at approximately 12:00 am, **WILLIAMS**, **SPARKS**, and **PEREZ-MARTINEZ**, were seen entering 6138 Citadel Drive. **SPARKS** was observed removing an item from his rear waistband, believed to be a firearm, upon exiting the vehicle. It was unclear whether **SPARKS** placed the item back inside the vehicle or inside a bag he carried into 6138 Citadel Drive. **SPARKS**, **PEREZ-MARTINEZ**, and **WILLIAMS** were observed carrying multiple items 6138 Citadel Drive from the **Target Vehicle**. At approximately 12:37 am, **WILLIAMS**, **SPARKS**, and **PEREZ-MARTINEZ** were observed from video review exiting the apartment complex wearing different clothes and getting into the **Target Vehicle**. The **Target Vehicle** was observed departing the area. On both entry and exit all three were observed in a white Mercedes SUV matching the description of the **Target Vehicle** of **WILLIAMS** described above and the one he was arrested out of. **WILLIAMS**, **SPARKS**, and **PEREZ-MARTINEZ** were observed exiting 6138 Citadel Drive and getting into the same Mercedes vehicle believed to be the **Target Vehicle**. The vehicle was observed departing the area.

11. **WILLIAMS** was observed returning to the 6138 Citadel Drive and leaving multiple times. **SPARKS** and **PEREZ-MARTINEZ** were not observed returning to 6138 Citadel Drive.

12. On December 6, 2022, at approximately 11:50 a.m., **WILLIAMS** was arrested at 10332 East 63rd Plaza Court, Kansas City, Missouri driving the **Target Vehicle** and in possession of the **Target Telephone**. At his arrest, **WILLIAMS** was wearing the same pair of eyeglasses and black and white Kansas City Chiefs lanyard around his neck that appears to be seen in the apartment surveillance video.

13. Management at the 6138 Citadel Drive advised that approximately half an hour before Investigators arrived at 6138 Citadel Drive on December 6th at approximately 2:15 p.m., an individual who identified himself as **Williams's** son went into the management office and told management employees that his father, **WILLIAMS**, had a heart attack and was at the hospital. The individual who identified himself as **Williams's** son also told management that he locked up the apartment and that there was no one inside the apartment. Management told Investigators that the individual who identified himself as **Williams's** son took a backpack full of clothes and boots out of 6138 Citadel Drive, Apartment 205. At the time of both law enforcement and this unknown party's contact with management, **WILLIAMS** was already in custody and not located in the hospital.

14. Investigators believe the individual who identified himself as **Williams's** son drove a grey Honda Accord bearing a temporary license plate. The grey Honda Accord was believed to be observed at 345 Quincy Avenue, Kansas City, Missouri, a residence associated with **WILLIAMS**, and at 10332 East 63rd Plaza Court, Kansas City, Missouri, arrest location of **WILLIAMS**.

15. Investigators who reviewed the surveillance footage from 6138 Citadel Drive and the management of the 6138 Citadel Drive were shown a photograph of Steven Williams Jr. They identified Williams Jr. as **WILLIAMS's** son, and the same individual who was inside the management office earlier that day.

16. During physical surveillance of the 6138 Citadel Drive, an unknown white female matching the description of Dawn Branstietter, mother of **SPARKS**, was observed walking up to the exterior doors of 6138 Citadel Drive and was unable to open the locked exterior doors.


17. A cooperating witness told investigators that Branstietter advised them that **SPARKS** went to "Reno's" apartment last night to stay the night in south Kansas City on Troost at a senior citizen's home. "Reno" is another known street name for **WILLIAMS**. The address of 6138 Citadel Drive is in South Kansas City in the general area of Troost. **WILLIAMS** is approximately 64 years old. Branstietter also advised them that she tried to go see "Reno" this afternoon (December 6th) but learned that the law enforcement had already arrested him and left the area to avoid being seen by law enforcement.

18. On December 6th, 2022, United States Magistrate Judge Lajuana M. Counts issued a federal search warrant (22-sw-00717-JAM(LMC)) for the apartment at the St. James Apartment complex where **WILLIAMS** resided. It was then executed on December 6th. Located therein were a pair of shoes ("off white in color slides") that appeared to be the shoes **SPARKS** was wearing when he escaped.

19. As of this time, neither **SPARKS** nor **PEREZ-MARTINEZ** have been located. Other than the above-described **Target Telephone** and shoes, none of their jail clothes nor any other items possibly associated with their escape, have been located.

20. Based on the foregoing, investigators have probable cause to believe clothing, cellular telephones, other devices, and information related to the escape of **SPARKS** and **PEREZ-MARTINEZ** are in the **Target Vehicle** and that information related to the escape and subsequent actions of the parties will be found on the **Target Telephone**.

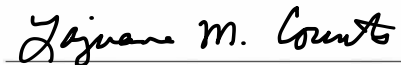
FURTHER AFFIANT SAYETH NAUGHT.


Trisha McCormick
Special Agent
Federal Bureau of Investigation

Subscribed to and sworn to before me this 7th day of December 2022.

Sworn to by telephone

11:08 AM, Dec 7, 2022


HONORABLE LAJUANA M. COUNTS
United States Magistrate Judge
Western District of Missouri

